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6 Attorney for **WILCOX**

7
8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA
10

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 vs.
14 CRAIG WILCOX,
15 Defendant.
16

2:13-cr-00256-LDG-PAL

UNOPPOSED MOTION TO EXTEND
SURRENDER DATE

(Second Request)

17 Craig Wilcox, by and through his attorney of record, Alina M. Shell, Assistant Federal Public
18 Defender, hereby moves this Court to vacate and continue the surrender date currently scheduled for
19 September 5, 2014 at 12:00 p.m. to October 3, 2014.

20 This Motion is Requested for the following reasons:

21 1. Wilcox has been on pretrial release since his initial appearance in this case on
22 July 18, 2013.

23 2. On April 7, 2014, this Court ordered Wilcox to self-surrender to an institution
24 designated by the federal Bureau of Prisons (BOP) by 12:00 p.m. on July 7, 2014. (*See* Docket #24
25 (minutes of sentencing); *see also* Docket #25 (written judgment).)

26 3. That on June 18, 2014, this Court granted Wilcox's unopposed motion to extend his
27 original surrender date.

28 4. That as of this date, BOP has designated CI Taft in Taft, California as the facility for

1 Wilcox's surrender.

2 4. Wilcox seeks this extension to complete a construction project he is supervising as
3 part of his employment. As noted in the first unopposed motion to extend his self-surrender date,
4 Wilcox works Hilton Cabinets in Phoenix, Arizona. Wilcox is currently supervising the installation
5 of cabinets at an apartment complex in Scottsdale, Arizona. The project is scheduled to be
6 completed September 25, 2014. Wilcox requests this second extension of his surrender date so he
7 can fulfill his obligations to Hilton Cabinets and supervise the installation project to its completion.

8 5. That undersigned counsel does not intend to move for any further extensions of the
9 surrender date absent compelling exigent circumstances.

10 6. That on August 8, 2014, undersigned counsel contacted counsel for the United States,
11 Assistant United States Attorney J. Gregory Damm. The government does not oppose this motion
12 to extend Wilcox's surrender date.

13 For the foregoing reasons, counsel moves this Court to enter a one-time extension of the
14 surrender date, thereby allowing Wilcox to surrender to the designated BOP facility by October
15 3, 2014 at 12:00 p.m.

16 DATED this 11th day of August, 2014.

17
18 RENE L. VALLADARES
19 Federal Public Defender

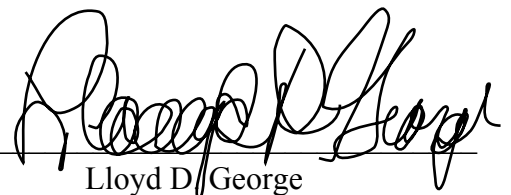
20 /s/ Alina M. Shell

21 By: _____
22 ALINA M. SHELL,
23 Assistant Federal Public Defender

24 ORDER

25 IT IS SO ORDERED.

26 DATED this 11 day of August, 2014.

27
28 
Lloyd D. George
Sr. U.S. District Judge